

Regarding Amendment of the commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band GN Docket No. 12-354

Comments of the Salt River Project Agricultural Improvement and Power District

Pursuant to Section 1.405 of the Commission's Rules, the Salt River Project Agricultural Improvement and Power District (SRP) hereby files the following reply comments regarding the above referenced Notice of proposed Rulemaking and Order, GN Docket No. 12-354.

SRP supports the Commission's proposal to allocate 100 MHz of spectrum for a Citizens Broadband Service at 3550-3650 MHz for spectrum sharing and small cell use for fixed and mobile broadband services with a Priority Access tier designated for small cell use by certain critical users at specific locations.

SRP agrees with the Commission that utilities should be included for eligibility to access the Priority Access tier.

SRP agrees that geographic separation and database management should provide Priority Access users with a usable quality of service capability.

SRP supports the Commission's proposal to establish a Spectrum Access System (SAS) database to aid in managing interference issues.

SRP supports the Commission's proposal to combine the 3550-3650 MHz band with the 3650-3700 MHz band. Operating the entirety of this spectrum under the same rules may help alleviate issues with the current database which is unusable in some locations.

SRP supports the Commission's proposed technical specifications including the use of spectrum sensing technologies and FCC authorization of equipment to be used on these frequencies.

SRP agrees with the use of band segmentation for priority users to further protect critical users from interference from lower priority users.

Respectfully Submitted,

Salt River Project Agricultural Improvement and Power District

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